

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
This document relates to: <i>Faulkner v. Bin Laden, et al.</i>	09-cv-7055 (GBD)(SN) ECF Case

**PLAINTIFF'S NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST THE ISLAMIC EMIRATE OF AFGHANISTAN**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and the Declaration of James F. Peterson, Esq. with attached exhibits, Plaintiff, by counsel, respectfully moves the Court for an ORDER granting Plaintiff's motion for entry of default judgment against the Defendant Islamic Emirate of Afghanistan and respectfully moves this Court for an ORDER: (1) awarding Plaintiff economic damages in the amount of \$3,967,999; (2) an award to Plaintiff as personal representative for pain and suffering in the amount of \$2,000,000; (3) an award of solatium damages to Plaintiff as a spouse of in the amounts of \$12,500,000; (3) award Plaintiff prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages;

July 14, 2022

Respectfully submitted,

JUDICIAL WATCH, INC.

/s/ James F. Peterson
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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2021, a copy of the foregoing was filed via the Court's CM/ECF filing system, which sent notification of such filing to counsel of record in this case.

/s/ James F. Peterson
James F. Peterson